

THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PLUMBERS AND PIPEFITTERS LOCAL )  
UNION NO. 630 PENSION ANNUITY- )  
TRUST FUND, Individually and on Behalf of )  
All Others Similarly Situated, )  
Plaintiff, )  
vs. )  
NORTHWEST PIPE COMPANY, et al., )  
Defendants. )

No. 3:09-cv-05724-RBL

(Consolidated)

**STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING  
DEFENDANTS' ANSWER DATE**

**NOTE ON MOTION CALENDAR:  
September 15, 2011**

**STIPULATION**

WHEREAS, on December 20, 1010, plaintiff Plumbers and Pipefitters Local No. 630 Pension Annuity-Trust Fund filed a Consolidated Complaint in this action; and

WHEREAS, on February 25, 2011, defendants filed motions to dismiss the Consolidated Complaint; and

WHEREAS, on August 26, 2011, the Court entered an Order denying defendants' motions to dismiss the Consolidated Complaint; and

WHEREAS, on September 10, 2011, the Court entered a Minute Order setting dates for the parties' FRCP 26(f) Conference, Initial Disclosures pursuant to FRCP 26(a)(1), and Combined Joint Status Report and Discovery Plan pursuant to FRCP 26(f) and Local Rule CR 16.

STIPULATION AND [PROPOSED] ORDER RE DEFENDANTS'  
ANSWER DATE - 1

CASE NO. 3:09-cv-05724-RBL

709280.0001/5173258.4

LANE POWELL PC  
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206.223.7000 FAX: 206.223.7107

1        THEREFORE, the parties, by and through their undersigned counsel, hereby stipulate  
2 and agree as follows:

3            1.        Defendants' answers to the Consolidated Complaint will be filed on or before  
4 October 24, 2011; and

5            2.        Plaintiff's objections to defendants' answers, if any, will be filed on or before  
6 November 23, 2011.

7 DATED: September 19, 2011

ROBBINS GELLER RUDMAN & DOWD LLP

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Additional Counsel for Plaintiff

STIPULATION AND [PROPOSED] ORDER RE DEFENDANTS'  
ANSWER DATE - 2

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Attorneys for Defendant Brian W. Dunham

STIPULATION AND [PROPOSED] ORDER RE DEFENDANTS'

ANSWER DATE - 3

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21 Attorneys for Defendant Stephanie J. Welty

22 **ORDER**

23 Based on the above Stipulation of the parties, by and through their counsel of record,  
24 and for good cause showing, IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

25 1. Defendants' answers to the Consolidated Complaint will be filed on or before  
26 October 24, 2011; and

2. Plaintiff's objections to defendants' answers, if any, will be filed on or before  
November 23, 2011.

DATED: September 20, 2011.

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24   
25 THE HONORABLE RONALD B. LEIGHTON  
26 UNITED STATES DISTRICT COURT JUDGE

STIPULATION AND [PROPOSED] ORDER RE DEFENDANTS'  
ANSWER DATE - 4

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1 Presented by:

2 LANE POWELL PC

3 /s/ Larry S. Gangnes

4 Milo Petranovich (Admitted *pro hac vice*)

5 Larry S. Gangnes, WSBA No. 08118

6 Attorneys for Defendant Brian W. Dunham

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